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Counsel for Defendant, ADAM WORKMAN

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION

UNITED STATES OF AMERICA,  
PLAINTIFF,

v.

ADAM WORKMAN,  
DEFENDANT.

CR 20-040 JD

STIPULATION TO CONTINUE HEARING;  
~~[PROPOSED]~~ ORDER

IT IS HEREBY STIPULATED, by the parties to this action, that the hearing currently set for June 30, 2020, be continued to August 5, 2020, for change of plea and sentencing. The parties have reached a plea agreement, which has been lodged with the Court. Defense counsel requested records related to sentencing mitigation on May 19, 2020, but all of them have not yet arrived. The parties agree and stipulate that the time between June 30, 2020, and August 5, 2020, should be excluded for effective preparation and continuity of counsel under 18 U.S.C. §3161(h)(7)(A),(B)(iv).

DATED: June 1, 2020

\_\_\_\_\_/S/  
ELLEN V. LEONIDA  
Assistant Federal Public Defender  
Counsel for Defendant Adam Workman

1 DATED: June 1, 2020

2 /S/  
 3 RICHARD EWENSTEIN  
 4 Assistant United States Attorney

5 **ORDER**

6 Based upon the facts set forth in the stipulation of the parties and for good cause shown,  
 7 the Court vacates the hearing currently set for June 30, 2020, and finds that failing to exclude the  
 8 time from June 30, 2020, through August 5, 2020, would unreasonably deny defense counsel and  
 9 the defendant the reasonable time necessary for effective preparation, taking into account the  
 10 exercise of due diligence. 18 U.S.C. § 3161(h)(7)(B)(iv). The Court further finds that the ends of  
 11 justice served by excluding the time from June 30, 2020, through August 5, 2020, from  
 12 computation under the Speedy Trial Act outweigh the best interests of the public and the  
 13 defendant in a speedy trial. 18 U.S.C. § 3161(h)(7)(A). Therefore, and with the consent of the  
 14 parties, IT IS HEREBY ORDERED that the change of plea and sentencing hearing set for June 30,  
 15 2020, be vacated and time from June 30, 2020, through August 5, 2020, shall be excluded from  
 16 computation under the Speedy Trial Act. 18 U.S.C. § 3161(h)(7)(A), (B)(iv). The Court sets this  
 17 matter for change of plea and sentencing on August 5, 2020.

18 IT IS SO ORDERED.

19 June 9, 2020  
 20 DATED: \_\_\_\_\_

21   
 22 HON. JAMES DONATO  
 23 UNITED STATES DISTRICT JUDGE  
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